

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
NPC International, Inc., et al.,	§	Case No. 20-33353 (DRJ)
	§	
Debtors.	§	Jointly Administered

**SSP BLUE RIDGE, LLC'S MOTION FOR RELIEF FROM
THE AUTOMATIC STAY**

This is a motion for relief from the automatic stay. If it is granted, the movant may act outside of the bankruptcy process. If you do not want the stay lifted, immediately contact the moving party to settle. If you cannot settle, you must file a response and send a copy to the moving party at least 7 days before the hearing. If you cannot settle, you must attend the hearing. Evidence may be offered at the hearing and the court may rule.

Represented parties should act through their attorney.

There will be a hearing on this matter on September 10, 2020 at 2:00 p.m. in Courtroom 400, 515 Rusk, Houston, TX 77002.

SSP BLUE RIDGE, LLC (“**Movant**”) files this its *Motion for Relief from the Automatic Stay* (the “**Motion**”) and, in support thereof, would respectfully show the Court as follows:

PARTIES AND JURISDICTION

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (G), and (O). Venue is proper in this district pursuant to 28 U.S.C. § 1409. This Court has authority to grant the relief requested pursuant to §§ 362(d) of title 11 of the United States Code (the “**Bankruptcy Code**”)¹, Fed. R. Bankr. P. 4001, and BLR 4001-1.

2. The Debtors filed their jointly administered bankruptcy cases under Chapter 11 on July 1, 2020 (the “**Petition Date**”).

¹ Except as otherwise noted herein, all section (§) references are to the Bankruptcy Code.

3. Movant is a lessor of a lease with Debtor NPC International, Inc. (“**Debtor**”) for a Pizza Hut store, for which lease the Debtor gave a pre-petition notice of termination to Movant on May 19, 2020, with an effective lease termination date of July 31, 2020. Movant is also a creditor and party-in-interest in this proceeding.

THE LEASE

4. Debtor executed a Lease Agreement with Movant on or about February 15, 1985 for lease of certain property commonly known as “Pizza Hut #4793 and situated at 1480 Terrell Mill Rd., Suite E, in Marietta, Georgia (as amended, the “**Lease**”). A true and correct copy of the Lease, together with a copy of all applicable amendments, is attached hereto as Exhibit “A” and incorporated herein for all purposes.

5. On May 19, 2020, the Debtor and Movant entered into that certain Lease Termination Agreement, through which the Debtor agreed that the Lease would terminate July 31, 2020 (the “**Lease Termination Agreement**”). A true and correct copy of the Lease Termination Agreement is attached hereto as Exhibit “B” and incorporated herein for all purposes.

6. The Debtor is delinquent in failing to pay both prepetition and post-petition rentals owing pursuant to the Lease up to and including the Lease termination date of July 31, 2020 (the “**Lease Termination Date**”). In addition, the Debtor has held over after the Lease Termination Date, has continued to operate the leased premises after the Lease Termination Date, and has not paid any rent or holdover rent to Movant or otherwise compensated Movant for use of the leased premises.

7. Movant is the current owner of the real property subject to the Lease and landlord under the Lease and is entitled to enforce all rights thereunder, to receive all sums due thereunder, to receive compensation for use of the leased premises following the termination of the Lease, and to obtain immediate possession of the leased premises.

SECTION 362(d)(1) “CAUSE” - LACK OF ADEQUATE PROTECTION

8. The Lease terminated as of July 31, 2020 pursuant to the Lease Termination Agreement. Movant has asked the Debtor to vacate the leased

premises covered by the Lease so that Movant can lease same to others, but Debtor has failed and refused to do so, and has also failed to pay both prepetition and post-petition amounts owed to Movant under the Lease, and to compensate Movant for its use of the leased premises following the Petition Date and the Lease Termination Date. As of the date hereof, the amount of total delinquency under the Lease is no less than \$8,340 through July, 2020, of which the total delinquency post-petition under the Lease is no less than \$4,170.00. Movant reserves all rights related to the delinquency under the Lease.

9. Section 362(d) of the United States Bankruptcy Code authorizes relief from the stay as provided in Section 362(a) under the following circumstance:

(1) for cause, including the lack of adequate protection of the interest in property of such party-in-interest[.]

10. “What constitutes ‘cause’ for the lifting of the stay pursuant to Section 362(d)(1) is not defined in the Bankruptcy Code. Whether cause exists must be determined on a case by case basis based on an examination of the totality of circumstances.” *In re WGMJR, Inc.*, 435 B.R. 423, 432 (Bankr. S.D. Tex. 2010) (citing *In re Reitnauer*, 152 F.3d 341, 343 n.4 (5th Cir. 1998); *In re Mendoza*, 111 F.3d 1264 (5th Cir. 1997)). For purposes of § 362(d)(1), “cause” may arise from a lack of adequate protection or from a variety of other circumstances. *Lomas Mortgage USA, Inc. v. Elmore*, 94 B.R. 670, 672 (Bankr. C.D. Cal. 1988); *see also Sun Valley Ranchers, Inc. v. Equitable Life Insurance Society of the United State (In re Sun Valley Ranchers, Inc.)* 823 F.2d 1373, 1376 (9th Cir. 1987).

11. In the instant motion, Section 362(d)(1) is applicable and authorizes this Court to grant the relief requested and lift the automatic stay to allow Movant to exercise all rights and available remedies under state law with respect to the leased premises, including, but not limited to evicting the Debtor or other debtors in the above captioned proceedings from the leased premises covered by the Lease or to otherwise obtain possession of the leased premises as provided for by state law.

12. Without relief from the stay, Movant will be left solely with a claim against the Debtor (including a claim for administrative rent), which the Debtor may not be able to satisfy.

13. Finally, imposition of the Rule 4001(a)(3) stay will directly harm Movant by requiring it to wait 14 days before it can begin the process of removing

the Debtor and mitigating its damages. For the above and foregoing reasons, Movant asserts cause exists sufficient to lift the automatic stay and waive the requirement of Bankruptcy Rule 4001(a)(3), therefore allowing an order on this Motion to be effective immediately upon entry.

WHEREFORE, PREMISES CONSIDERED, Movant prays:

1. For an order granting Movant relief from the automatic stay of 11 U.S.C. § 362(a) as it applies to the Debtor or any of the other debtors in the above captioned cases, the Debtors' Estates, and the leased premises covered by the Lease;
2. For an order allowing Movant to exercise all rights and available remedies under state law, including, but not limited to, evicting the Debtor or other debtors in the above captioned proceedings from the leased premises covered by the Lease or to otherwise obtain possession of the leased premises as provided for by state law;
3. That the fourteen day period otherwise imposed by Bankruptcy Rule 4001(a)(3) not be applicable to this Order; and
4. For such other and further relief to which Movant is justly entitled.

Dated: August 13, 2020.

Respectfully submitted,

/s/ Jay L. Krystinik
Keith M. Aurzada (TX Bar No. 24009880)
Jay L. Krystinik (TX Bar No. 24041279)
REED SMITH LLP
2501 N. Harwood St., Ste. 1700
Dallas, Texas 75201
T: 469.680.4200
F: 469.680.4299
kaurzada@reedsmith.com
jkrystinik@reedsmith.com

Attorneys for SSP BLUE RIDGE, LLC

CERTIFICATE OF CONFERENCE

I hereby certify that, on August 12, 2020, I contacted counsel for the Debtor via telephone at 3:54 p.m. to discuss seeking relief from the automatic stay. On August 13, 2020, I contacted counsel for the Debtor again via telephone at 11:19 a.m. to discuss seeking relief from the automatic stay. I have been unable to reach Debtor's counsel. Therefore the matter is presented to the Court for determination.

CERTIFICATE OF SERVICE

The undersigned certifies that, on August 13, 2002, a true and correct copy of the foregoing document was served via first class mail or via the Court's Electronic Case Filing (ECF) System to (i) the Debtor and Debtor's counsel; (ii) the Office of the United States Trustee; and (iii) those persons on the attached service list.

/s/ Jay L. Krystinik

Jay L. Krystinik

AKERMAN LLP
(COUNSEL TO KOVNICK JAX, LLC & TINSELTOWN
PLAZA, LLC)
ATTN: YELENA ARCHIYAN
2001 ROSS AVE, STE 3600
DALLAS, TX 75201

AKERMAN LLP
(COUNSEL TO KOVNICK JAX, LLC & TINSELTOWN
PLAZA, LLC)
ATTN: JACOB A. BROWN
50 N LAURA ST, STE 3100
JACKSONVILLE, FL 32202

ALABAMA POWER COMPANY
ATTN: MARK A. CROSSWHITE
600 18TH ST N
BIRMINGHAM, AL 35203-2220

ALABAMA POWER COMPANY
ATTN: MARK A. CROSSWHITE
PO BOX 242
BIRMINGHAM, AL 35292

ALSTON & BIRD LLP
(COUNSEL TO MCLANE FOODSERVICE, INC.)
ATTN: JONATHAN T EDWARDS & DAVID A. WENDER
ONE ATLANTIC CENTER
1201 WEST PEACHTREE STREET
ATLANTA, GA 30309

ALSTON & BIRD LLP
(COUNSEL TO MCLANE FOODSERVICE, INC.)
ATTN: JONATHAN T. EDWARDS;DENNIS J. CONNOLLY
DAVID A. WENDER; JACOB JOHNSON
ONE ATLANTIC CENTER
1201 WEST PEACHTREE ST
ATLANTA, GA 30309

AMERICAN REALTY CAPITAL
ATTN: DEBBIE HESTER
2325 EAST CAMELBACK ROAD SUITE 1100
PHOENIX, AZ 85016

BARCLAY DAMON LLP
(COUNSEL TO RIVERCREST REALTY ASSOCIATES, LLC)
ATTN: KEVIN M. NEWMAN, ESQ.
BARCLAY DAMON TOWER
125 EAST JEFFERSON STREET
SYRACUSE, NY 13202

BARCLAY DAMON LLP
(COUNSEL TO RIVERCREST REALTY ASSOCIATES, LLC)
ATTN: SCOTT L. FLEISCHER, ESQ.
1270 AVENUE OF THE AMERICAS, SUITE 501
NEW YORK, NY 10020

BGE
ATTN: LEGAL NOTICES
PO BOX 13070
PHILADELPHIA, PA 19101

BINGMAN, HESS, COBLENTZ & BELL, P.C.
(COUNSEL TO MUHLENBERG TOWNSHIP AUTHORITY)
ATTN: THOMAS A. ROTHERMEL, ESQ.
TREEVIEW CORPORATE CENTER, SUITE 100
2 MERIDIAN BLVD
WYOMISSING, PA 19610

BOTTLING GROUP LLC
ATTN: ASHLEY MYERS
75 REMITTANCE DR
CHICAGO, IL 60675

BOYLAN CODE LLP
(COUNSEL TO LYELL ASSOCIATES, LLC)
ATTN: DEVIN LAWTON PALMER, ESQ.
145 CULVER ROAD, SUITE 100
ROCHESTER, NY 14620

CHAMBERLAIN HRDLICKA
(COUNSEL TO DELJIZ, INC., RECO, LLC)
ATTN: JARROD B. MARTIN
1200 SMITH ST, STE 1400
HOUSTON, TX 77002

CLEARY GOTTlieb STEEN & HAMILTON LLP
(COUNSEL TO THE WENDY'S COMPANY, ET AL.)
ATTN SEAN A O'NEAL & SHANNON DAUGHERTY
ONE LIBERTY PLAZA, 1 LIBERTY ST.
NEW YORK, NY 10006

COLE SCHOTZ P.C.
(COUNSEL TO 2033 CHAMBERSBURG, LLC)
ATTN MICHAEL D. WARNER, ESQ,
BENJAMIN L. WALLEN, ESQ.
301 COMMERCE ST, STE 1700
FORT WORTH, TX 76102

COMMONWEALTH OF PENNSYLVANIA DEPT
OF LABOR & INDUSTRY COLLECTIONS SUPPORT UNIT
ATTN DEB SECREST
651 BOAS ST, RM 925
HARRISBURG, PA 17121

DLA PIPER LLP (US)
(COUNSEL TO CR PELICAN PRESERVE, LLC, CR
MANGO, LLC, AND CR MONTEVALLO, LLC)
ATTN ANDREW B. ZOLLINGER
1900 N. PEARL ST, STE 2200
DALLAS, TX 75201

DLA PIPER LLP (US)
(COUNSEL TO CR PELICAN PRESERVE, LLC, CR
MANGO, LLC, AND CR MONTEVALLO, LLC)
ATTN RICHARD M. KREMEN, VIRGINIA R. CALLAHAN
6225 SMITH AVE
BALTIMORE, MD 21209

DOMINION VIRGINIA POWER
ATTN: THOMAS F. FARRELL, II
PO BOX 26543
RICHMOND, VA 23290

DUKE ENERGY
ATTN: LYNN GOOD
526 SOUTH CHURCH ST.
CHARLOTTE, NC 28202

DUKE ENERGY
ATTN: LYNN GOOD
PO BOX 70516
CHARLOTTE, NC 28272

DUKE ENERGY PROGRESS
ATTN: LYNN GOOD
PO BOX 1003
CHARLOTTE, NC 28201

ECKERT SEAMANS CHERIN & MELLOTT, LLC
(COUNSEL TO STRAUSS PROPERTIES, LLC)
ATTN: CHRISTOPHER L. PERKINS, ESQ.
919 E MAIN ST, STE 1300
RICHMOND, VA 23219

EICHENBAUM LILES P.A.
(COUNSEL TO METROPOLITAN REALTY & DEVELOPMENT,
LLC.)
ATTN BEN HONAKER
124 W. CAPITOL, STE 1900
LITTLE ROCK, AR 72201

EPIQ CORPORATE RESTRUTURING, LLC

EVERGY
ATTN: MARK A. RUELLE
PO BOX 219330
KANSAS CITY, MO 64121

EVERGY
ATTN: MARK A. RUELLE
ONE KANSAS CITY PLACE
1200 MAIN ST.
KANSAS CITY, MO 64105

FITZPATRICK LENTZ & BUBBA, P.C.
(COUNSEL TO PPL ELECTRIC UTILITIES CORP)
ATTN DOUGLAS J. SMILLIE
TWO CITY CENTER
645 W. HAMILTON ST, STE 800
ALLENTOWN, PA 18107-2197

GEORGIA AIR AND REFRIGERATION INC
ATTN: LEGAL NOTICES
50 GRAYSON INDUSTRIAL PARKWAY
GRAYSON, GA 30017

GIBSON, DUNN & CRUTCHER LLP
(COUNSEL TO AD HOC PRIORITY AND
FIRST LIEN LENDER GROUP)
ATTN SCOTT J. GREENBERG
200 PARK AVE
NEW YORK, NY 10166-0193

GIBSON, DUNN & CRUTCHER LLP
(COUNSEL TO AD HOC PRIORITY AND
FIRST LIEN LENDER GROUP)
ATTN MICHAEL J COHEN
200 PARK AVE
NEW YORK, NY 10166-0193

GIBSON, DUNN & CRUTCHER LLP
(COUNSEL TO AD HOC PRIORITY AND
FIRST LIEN LENDER GROUP)
ATTN ALAN MOSKOWITZ
200 PARK AVE
NEW YORK, NY 10166-0193

GIBSON, DUNN & CRUTCHER LLP
(COUNSEL TO AD HOC PRIORITY AND
FIRST LIEN LENDER GROUP)
ATTN CHRISTINA M BROWN
200 PARK AVE
NEW YORK, NY 10166-0193

GIBSON, DUNN & CRUTCHER LLP
(COUNSEL TO AD HOC PRIORITY AND
FIRST LIEN LENDER GROUP)
ATTN STEVE E SLETTEN
333 SOUTH GRAND AVENUE
LOS ANGELES, CA 90071-3197

GOULSTON & STORRS PC
(COUNSEL TO SVCN 1 LLC & SVCN 2 LLC)
ATTN VANESSA P MOODY & DOUGLAS B. ROSNER
400 ATLANTIC AVENUE
BOSTON, MA 02110-3333

HIRSCHLER FLEISCHER
(COUNSEL TO CEDAR ROAD FF, LLC)
ATTN LAWRENCE A. KATZ
8270 GREENSBORO DR, STE 700
TYSONS CORNER, VA 22102

HOFFMAN & SAWERIS, P.C.
(COUNSEL TO DUN RITE, INC., NASHWAY, LLC)
ATTN MATTHEW HOFFMAN & ALAN BRIAN SAWERIS
2777 ALLEN PARKWAY, STE 1000
HOUSTON, TX 77019

HOWLEY LAW PLLC
(COUNSEL TO THE WENDY'S COMPANY, ET AL.)
ATTN TOM A HOWLEY & ERIC TERRY
PENNZOIL PLACE - SOUTH TOWER
711 LOUISIANA ST., SUITE 1850
HOUSTON, TX 77002

HUNTON ANDREWS KURTH LLP
(COUNSEL TO WILMINGTON SAVINGS FUND SOCIETY, FSB)
ATTN TIMOTHY A. ("TAD") DAVIDSON II &
ASHLEY L. HARPER
600 TRAVIS ST, STE 4200
HOUSTON, TX 77002

HUSCH BLACKWELL LLP
(COUNSEL TO M&S REAL ESTATE CO., LLC)
ATTN LYNN HAMILTON BUTLER
111 CONGRESS AVE, STE 1400
AUSTIN, TX 78701

I.P.H.F.H.A. INC.
ATTN: KATHY ALFORD
7829 E ROCKHILL ST
WICHITA, KS 67206

INTERNAL REVENUE SERVICES
CENTRALIZED INSOLVENCY OPERATION
P.O. BOX 7346
PHILADELPHIA, PA 19101-7346

INTERNAL REVENUE SERVICES
DEPARTMENT OF THE TREASURY
1500 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, DC 20220

INTERNAL REVENUE SERVICES
LOCAL OFFICE
1100 COMMERCE STREET
ROOM 121
DALLAS, TX 75242

JACKSON WALKER LLP
(COUNSEL TO AD HOC PRIORITY AND
FIRST LIEN LENDER GROUP)
ATTN: BRUCE J. RUZINSKY
1401 MCKINNEY ST, STE 1900
HOUSTON, TX 77010

JESSICA PADGETT
C/O BRETT T. BURMEISTER
14701 E. 42ND ST.
INDEPENDENCE, MO 64055

JOANNE HENSHAW
C/O JAMES J. AMATO, ESQ
NO. 1 MAHANTONGO ST.
POTTSVILLE, PA 17901

JOHNSON DIVERSEY INC
ATTN: MICHAEL MACEDO
450 FERGUSON DR
MOUNTAIN VIEW, CA 94043

JONES WALKER LLP
(COUNSEL TO O.B. COMMONS, LLC)
ATTN: JOSEPH E. BAIN & GABRIELLE A. RAMIRES
811 MAIN ST, STE 2900
HOUSTON, TX 77002

KELLER LENKNER LLC
(COUNSEL TO PLAINTIFFS KRISTEN MARSHALL, ET AL.)
ATTN SETH MEYER
150 NORTH RIVERSIDE PLAZA, SUITE 4270
CHICAGO, IL 60606

KELLEY DRYE & WARREN LLP
(PROPOSED COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS)
ATTN: E.R.WILSON, J.R.ADAMS, M.J.MCLAUGHLIN,
S.T.WILSON & K.KATSIONIS, ESQS.
101 PARK AVE
NEW YORK, NY 10178

KELLY, MORGAN, DENNIS, CORZINE & HANSEN, PC
(COUNSEL TO LEGENDARY SKY, LTD.)
ATTN: MICHAEL G. KELLY
PO BOX 1311
ODESSA, TX 79760-1311

KURTZMAN STEADY, LLC
(COUNSEL TO UNION BOILER WORKS, INC.)
ATTN: JEFFREY KURTZMAN, ESQ.
401 S. 2ND ST, STE 200
PHILADELPHIA, PA 19147

LINEBARGER GOGGAN BLAIR & SAMPSON, LLP
(COUNSEL TO SMITH, TARRANT, DALLAS COUNTIES AND
IRVING ISD)
ATTN LISA LARGE COCKRELL
2777 N. STEMMONS FREEWAY, STE 1000
DALLAS, TX 75207

LINEBARGER GOGGAN BLAIR & SAMPSON, LLP
(COUNSEL TO COUNTIES OF JASPER, ORANGE, HARRIS,
ANGELINA, MONTGOMERY, HOUSTON CAD, JEFFERSON,
SILSBEE ISD)
ATTN TARA L. GRUNDEMEIER
PO BOX 3064
HOUSTON, TX 77253-3064

LIQUID ENVIRONMENTAL SOLUTIONS
ATTN: LEGAL NOTICES
7651 ESTERS BOULEVARD SUITE 200
IRVING, TX 75063

LIQUID ENVIRONMENTAL SOLUTIONS
ATTN: LEGAL NOTICES
PO BOX 733372
DALLAS, TX 75373

MANIER & HEROD, P.C.
(COUNSEL TO ARCH INSURANCE COMPANY)
ATTN MICHAEL E COLLINS
1201 DEMONBREUN ST., SUITE 900
NASHVILLE, TN 37219

MBH ENTERPRISES LLC
ATTN: BRANDY CHORMANN
12220 CHATTANOOGA PLAZA #289
MIDLOTHIAN, VA 23112

MCCREARY, VESELKA, BRAGG & ALLEN, P.C.
(COUNSEL TO HARDIN COUNTY AND
JASPER COUNTY, TEXAS)
ATTN TARA LEDAY
PO BOX 1269
ROUND ROCK, TX 78680

MCDERMOTT WILL & EMERY LLP
(COUNSEL TO PIZZA HUT, LLC)
ATTN CHARLES R GIBBS, ERIC SEITZ & JANE A GERBER
2501 N. HARWOOD ST, STE 1900
DALLAS, TX 72501-1644

MCDERMOTT WILL & EMERY LLP
(COUNSEL TO PIZZA HUT, LLC)
ATTN NATHAN F COCO
TWO ALLEN CTR, 1200 SMITH ST, STE 1600
HOUSTON, TX 77002-4403

MCLANE
ATTN: KIMBERLY MROZINSKI
2085 MIDWAY RD
CARROLLTON, TX 75006

MEYERS, RODBELL & ROSENBAUM, P.A.
(COUNSEL TO CALVERT COUNTY, MARYLAND)
ATTN NICOLE C. KENWORTHY
6801 KENILWORTH AVE, STE 400
RIVERDALE, MD 20737-1385

MILBANK LLP
COUNSEL TO THE SECOND LIEN AD HOC GROUP
ATTN: MATTHEW BROD
55 HUDSON YARDS
NEW YORK, NY 10001

MILLER, GRIFIN, MARKS, P.S.C.
(COUNSEL TO RICHMOND RD VLG. SHOPPES, LLC)
ATTN DONALD R. ROSE
271 W. SHORT ST, STE 6000
LEXINGTON, KY 40507

MILLS HALSTEAD & ZALOUDEK, LLC
(COUNSEL TO HAMPDEN TC PROPERTIES, LLC)
ATTN: AMANDA H. HALSTEAD
600 17TH ST, STE 2800S
DENVER, CO 80202

MORGAN & MORGAN PA
(COUNSEL TO PLAINTIFFS KRISTIN MARSHALL, ET AL.)
ATTN PAUL BOTROS, ESQ.
16255 PARK TEN PL., STE 500
HOUSTON, TX 77084

MORGAN & MORGAN PA
(COUNSEL TO PLAINTIFFS KRISTIN MARSHALL, ET AL.)
ATTN PAUL BOTROS, ESQ
8151 PETERS RD,STE 400
PLANTATION, FL 33324

MOSES & SINGER LLP
CNSL TO THE PREPETITION COLLAT. AGENTS
ATTN: ANDREW OLIVER
405 LEXINGTON AVENUE
NEW YORK, NY 10174

NPC INTERNATIONAL, INC.
ATTN: ERIC KOZA, CHIEF RESTRUCTURING OFFICER
4200 W. 115TH STREET, SUITE 200
LEAWOOD, KS 66211

OFFICE OF THE ATTORNEY GENERAL OF TEXAS
BANKRUPTCY & COLLECTIONS DIVISION
(COUNSEL TO TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
UNCLAIMED PROPERTY DIVISION; AND STATE OF TEXAS)
ATTN JASON B BINFORD; LAYLA D MILLIGAN, ASST AGS
PO BOX 12548 - MC 008
AUSTIN, TX 78711-2548

OFFICE OF THE UNITED STATES TRUSTEE
515 RUSK STREET, SUITE 3516
HOUSTON, TX 77002

OFFIT KURMAN, P.A.
(COUNSEL TO BROADLANDS VILLAGE LLC, ET AL.)
ATTN STEPHEN A METZ, ESQ
4800 MONTGOMERY LANE, 9TH FL
BETHESDA, MD 20814

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
(COUNSEL TO KKR LOAN ADMINISTRATION SERVICES LLC)
ATTN BRIAN S. HERMANN, AUSTIN WITT & TERESA LII
1285 AVENUE OF THE AMERICAS
NEW YORK, NY 10019-6064

PERDUE, BRANDON, FIELDER, COLLINS & MOTT, LLP
(COUNSEL TO HOUSTON COUNTY AND TYLER INDEPENDENT
SCHOOL DISTRICT)
ATTN TAB BEALL
305 S BROADWAY AVE, STE 200
TYLER, TX 75702

PERDUE, BRANDON, FIELDER, COLLINS & MOTT, LLP
(COUNSEL TO CITY OF JASPER)
ATTN: MELISSA E. VALDEZ
1235 NORTH LOOP WEST, STE 600
HOUSTON, TX 77008

PH DIGICO LLC
ATTN: DEBBIE JONAS
7829 E ROCKHILL SUITE 201
WICHITA, KS 67206

PIZZA HUT INC
ATTN: KRISTIN MAYS
7100 CORPORATE DR.
PLANO, TX 75024

PIZZA HUT OF AMERICA INC
ATTN: JAY ALEXANDER
679 WILSON DOWNING RD
LEXINGTON, KY 40517

PIZZA HUT OF AMERICA INC
ATTN: JAY ALEXANDER
PO BOX 955641
SAINT LOUIS, MO 63195

PORTER HEDGES LLP
(COUNSEL TO KKR LOAN ADMINISTRATION SERVICES LLC)
ATTN JOHN F. HIGGINS, M.SHANE JOHNSON &
MEGAN N. YOUNG-JOHN
1000 MAIN ST. 36TH FL
HOUSTON, TX 77002

PRYOR CASHMAN LLP
(COUNSEL TO WILMINGTON SAVINGS FUND SOCIETY, FSB)
ATTN SETH H LIBERMAN, PATRICK SIBLEY &
ANDREW RICHMOND
7 TIMES SQUARE
NEW YORK, NY 10036

PUBLIX SUPER MARKET INC
ATTN: ALLISON DAVIS
3300 PUBLIX CORPORATE PKWY
LAKELAND, FL 33811

PUBLIX SUPER MARKET INC
ATTN: ALLISON DAVIS
PO BOX 32010
LAKELAND, FL 33802

R&W PIZZA HUT'S OF NC
ATTN: RUSTY GOODE
PO BOX 12100
DES MOINES, IA 50312

RESTAURANT SUPPLY CHAIN SOLUTIONS
ATTN: RICK MILES
950 BRECKENRIDGE LN. SUITE 300
LOUISVILLE, KY 40207

RESTAURANT SUPPLY CHAIN SOLUTIONS
ATTN: RICK MILES
PO BOX 638655
CINCINNATI, OH 45263

ROSENTHAL LAW FIRM, P.L.L.C.
(COUNSEL TO ALLEN INDUSTRIES, INC.)
ATTN TRENT L. ROSENTHAL
675 BERING DR, STE 150
HOUSTON, TX 77057

S&D LAW
(COUNSEL TO WILSON MONTGOMERY
VILLAGE PLAZA, LLC & ADLP-U&A, LLC)
ATTN MICHAEL L. SCHLEPP
1290 BROADWAY, STE 1650
DENVER, CO 80203

SAGAL, FILBERT, QUASNEY & BETTEN, P.A.
(COUNSEL TO SILVER BELL ASSOCIATES, LLP)
ATTN ALAN BETTEN ESQ. KIMBERLY MANUELIDES ESQ.
600 WASHINGTON AVE, STE 300
TOWSON, MD 21204

SAUL EWING ARNSTEIN & LEHR LLP
(COUNSEL TO SAVOY STATION LLC, WESTIN STATION
LLC, MOUNTAIN PARK STATION LLC, PLAZA OF THE
OAKS STATION LLC, POWELL VILLA STATION LLC)
ATTN MONIQUE B. DISABATINO, ESQ.
1201 N. MARKET ST, STE 2300
PO BOX 1266
WILMINGTON, DE 19899

SINGER & LEVICK, P.C.
(COUNSEL TO KIMCO REALTY CORPORATION)
ATTN MICHELLE E. SHRIRO, ESQ.
16200 ADDISON RD, STE 140
ADDISON, TX 75001

SIROTE & PERMUTT, P.C.
(COUNSEL TO HELENA PROPERTIES, LLC)
ATTN: STEPHEN B. PORTERFIELD
2311 HIGHLAND AVE SO
PO BOX 55727
BIRMINGHAM, AL 35255-5727

STAPLES BUSINESS ADVANTAGE
ATTN: LEGAL NOTICES
PO BOX 660409
DALLAS, TX 75266

STARK & STARK, P.C.
(COUNSEL TO HP WAUGHTOWN LLC & DP WAUGHTOWN LLC)
ATTN JOSEPH H. LEMKIN, ESQ.
PO BOX 5315
PRINCETON, NJ 08543

STEVENS & LEE, P.C
(COUNSEL TO PLAINTIFFS KRISTIN MARSHALL, ET AL.)
ATTN NICHOLAS F. KAJON & CONSTANTINE D.POURAKIS
485 MADISON AVENUE, 20TH FLOOR
NEW YORK, NY 10022

STEWART SOKOL & LARKIN LLC
(COUNSEL TO SPRINGBROOK PLAZA, LLC)
ATTN LAWRENCE A. WAGNER
2300 SW FIST AVE, STE 200
PORTLAND, OR 97201+5047

SYGMA MISSOURI
ATTN: LAQUADA JOHNSON
5550 BLAZER PKWY. SUITE 300
DUBLIN, OH 43017

SYGMA MISSOURI
ATTN: LAQUADA JOHNSON
PO BOX 28523
COLUMBUS, OH 43228

SYSCO USA I INC
ATTN: LESLEE DONIO
PO BOX 27633
SALT LAKE CITY, UT 84127

THE WENDYS COMPANY
ATTN: ERICA NEAL
1 DAVE THOMAS BLVD.
DUBLIN, OH 43017

THOMPSON BURTON PLLC
(COUNSEL TO WHLR-BRYAN STATION LLC & WHLR-
LUMBER RIVER VILLAGE, LLC)
ATTN JUSTIN T. CAMPBELL
1801 W. END, STE 1550
NASHVILLE, TN 37203

TIFFANY SMITH
C/O MARK ROSENBERG, ESQ.
554 LOMAX ST
JACKSONVILLE, FL 32204

TORNIG REALTY LLC
ATTN: MOSES KAZANJIAN
720 EAST PALISADE AVENUE SUITE 103
ENGLEWOOD CLIFFS, NJ 07632

U.S. ATTORNEY'S OFFICE
SOUTHERN DISTRICT OF TEXAS
ATTN RYAN PATRICK
1000 LOUISIANA, STE. 2300
HOUSTON, TX 77002

VALENTI MID ATLANTIC REALTY II
ATTN: STEVE NESBITT
PO BOX 8618
LANCASTER, PA 17604

WASHINGTON GLOBAL LAW GROUP, PLLC
(COUNSEL TO 1470 OLD BRIDGE, LLC)
ATTN: KERMIT A. ROSENBERG, ESQ.
1701 PENNSYLVANIA AVE, NW, STE 200
WASHINGTON, DC 20006

WEIL, GOTSHAL & MANAGES LLP
(COUNSEL TO THE DEBTORS)
ATTN: RAY C. SCHROCK, P.C., KEVIN BOSTEL, ESQ. &
NATASHA HWANGPO, ESQ.
767 FIFTH AVENUE
NEW YORK, NY 10153

WEIL, GOTSHAL & MANGES LLP
(COUNSEL TO THE DEBTORS)
ATTN: ALFREDO R. PEREZ, ESQ.
700 LOUISIANA STREET, SUITE 1700
HOUSTON, TX 77002

WELLS & CUELLAR, P.C.
(COUNSEL TO ANN GALLUZZO)
ATTN: JAMES E. CUELLAR
440 LOUISIANA, STE 718
HOUSTON, TX 77002

WHGRE LLC
ATTN: NIKKI MARION
3211 SHANNON RD SUITE 225
DURHAM, NC 27707

WILES & WILES, LLP
(COUNSEL TO BRANCH MILLPOND ASSC, LLC & SSP BLUE
RIDGE, LLC)
ATTN: VICTOR W. NEWMARK, ESQ.
800 KENNESAW AVE, STE 400
MARIETTA, GA 30060-7946

WILMER CUTLER PICKERING
HALE AND DORR LLP
(COUNSEL TO ELDRIDGE NPC HOLDINGS LLC,
WPH HOLDINGS II PARENT, LLC)
ATTN PHILIP D. ANKER, SALVATORE M. DANIELE
250 GREEMWICH ST
NEW YORK, NY 10007